

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

MEYALLI AGUIRRE,

Plaintiff,

v.

Case No. \_\_\_\_\_

SBM and ARCY WILSON,

Defendants.

**DECLARATION OF JANICE PERIOLAT**

I, Janice Periolat, hereby declare as follows:

1. I am over 18 years of age and make this declaration based on my personal knowledge.

2. I am employed by SBM Management Services, LP ("SBM") as its Human Resources Director.

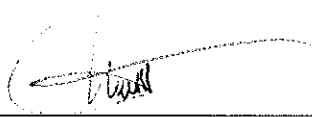
3. In my capacity as Human Resources Director, I am familiar with the ownership structure, state of organization, and principal place of business of SBM, and the state of residency of SBM's limited partners. SBM is a limited partnership organized in Delaware and with its principal place of business in California. SBM's limited partners, Charles Somers, Don Tracy, and Ron Alvarado, are all residents of California.

4. In my capacity as Human Resources Director, I am familiar with the employment policies and practices of SBM. I am also familiar with the employment records kept by SBM in the regular course of business and have access to SBM personnel records pertaining to each employee of the company, including each employee's rate of pay and work status.

5. I have reviewed SBM's personnel records for its former employee, Meyalli Aguirre. Ms. Aguirre's rate of pay during her employment at SBM was \$8.50 an hour. She was employed on a full time (i.e., 40 hours a week) basis.

6. Based on our information, Ms. Aguirre is a resident of New Mexico. When she was hired, she presented her New Mexico driver's license, attached, as identification, and worked for SBM in New Mexico.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

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JANICE PERIOLAT

Dated: \_\_\_\_\_

1/4/18